

ATTACHMENT H: FINANCIAL ASSURANCE DEMONSTRATION

Facility name: Archer Daniels Midland, CCS#2 Well
IL-115-6A-0001

Facility contact: Mr. Mark Burau, Plant Manager
4666 Faries Parkway, Decatur, IL
(217) 424-5750, mark.burau@adm.com

Well location: Decatur, Macon County, IL;
39°53'08", -89°53'19"

ADM is providing financial responsibility pursuant to 40 CFR 146.85. ADM is using a corporate guarantee to cover the costs of: corrective action, emergency and remedial response, injection well plugging, and post-injection site care and site closure.

The estimated costs of each of these activities, as provided in "Cost Estimate to Demonstrate Financial Responsibility for Class VI UIC Permit" (Patrick Engineering, March 13, 2014) are presented in Table 1:

Table 1. Cost Estimates for Activities to be Covered by Financial Responsibility

Activity	Total Cost (\$)
Performing Corrective Action on Wells in AoR	231,800
Plugging Injection Wells	594,120
Post-Injection Site Care	6,434,500
Site Closure	535,300
Emergency and Remedial Response	30,792,000



Archer Daniels Midland Company
4666 Faries Parkway
Decatur, IL 62525
T 217.424.5200

Letter from Chief Financial Officer

April 9, 2014

Mr. Steve Jann
Acting Branch Chief
UIC Branch (WU-16J)
U.S. Environmental Protection Agency Region 5
77 W. Jackson Blvd.
Chicago, IL 60604-3590

Dear Mr. Jann,

I am the chief financial officer of Archer Daniels Midland Company, headquartered at 4666 Faries Parkway, Decatur, IL 62525. This letter is in support of this firm's use of the financial test to demonstrate financial assurance.

This firm is the owner or operator of the following injection wells for which financial assurance for corrective action, injection well plugging, post injection site care and site closure, and/or emergency and remedial response is demonstrated through the financial test. The current corrective action, injection well plugging, post injection site care and site closure, and/or emergency and remedial response cost estimate covered by the test is shown for each injection well (i.e., all obligations secured by the owner or operator using by financial test):

EPA ID:	IL-115-6A-0001
Well Name:	CCS#2
Address:	4666 Faries Parkway, Decatur, IL 62525
Location:	39°53'08", -89°53'19
Cost Estimate:	\$38,927,820

This firm guarantees, through the corporate guarantee, the corrective action, injection well plugging, post injection site care and site closure, and/or emergency and remedial response of the following injection wells owned or operated by subsidiaries of this firm. The current cost estimate for corrective action, injection well plugging, post injection site care and site closure, and/or emergency and remedial response so guaranteed is shown for each injection well:

None

In states where EPA is not administering the financial requirements, this firm, as owner or operator or guarantor, is demonstrating financial assurance for the corrective action, injection well plugging, post injection site care and site closure, and/or emergency and remedial response of the following injection wells through the use of a test equivalent or substantially equivalent to the financial test. The current corrective action, injection well plugging, post injection site care and site closure, and/or emergency and remedial response cost estimate covered by such a test is shown for each injection well:

None

This firm is the owner or operator of the following injection wells for which financial assurance for corrective action, injection well plugging, post injection site care and site closure, and/or emergency and remedial response is not demonstrated either to EPA or a state through the financial test or any other financial assurance instrument. The current corrective action, injection well plugging, post injection site care and site closure, and/or emergency and remedial response cost estimate not covered by such financial assurance is shown for each injection well:

None

This firm is required to file a Form 10K with the Securities and Exchange Commission (SEC) for the latest fiscal year. The fiscal year of this firm ends on December 31. The figures for the following items marked with an asterisk are derived from this firm's independently audited, year-end financial statements for the latest completed fiscal year ended December 31, 2013.

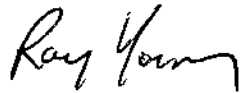
Financial Coverage Criteria

1.	(a) Cost in current dollars for corrective action, injection well plugging, post injection site care and site closure, and/or emergency and remedial response (i.e., all obligations secured by the owner or operator using the financial test)		\$ 39 MM
	(b) Sum of the company's financial responsibilities currently met using the financial test or corporate guarantee, including CERCLA and RCRA		\$ 3 MM
	(c) Total of lines a and b		\$ 42 MM
2.	Tangible net worth		\$19,435 MM
3.	Current assets		\$28,530 MM
4.	Current liabilities		\$15,658 MM
5.	Net working capital [line 3 minus line 4]		\$12,872 MM
6.	Total assets		\$43,752 MM
7.	Total assets in U.S.		\$30,674 MM
		Yes	No
8.	Is line 2 at least \$100 million?	X	
9.	Is line 2 at least 6 times line 1(c)?	X	
10.	Is line 5 at least 6 times line 1(c)?	X	
11.	Is line 7 at least 90% of Line 6? If not, complete line 12.		X
12.	Is line 7 at least 6 times line 1(c)?	X	

Bond Rating Test

1.	Current bond rating of most recent issuance of this firm and name of rating service (rating service must be either Standard & Poor's or Moody's)	A (S&P)
2.	Date of issuance of bond	10/16/2012
3.	Date of maturity of bond	04/16/2043
4.	Committee on Uniform Securities Identification Procedures (CUSIP) number	039483BF14

I hereby certify that the wording of this letter is identical to the wording specified in the Underground Injection Control VI Program Financial Responsibility Guidance as such regulations were constituted on the date shown immediately below.

A handwritten signature in black ink, appearing to read "Ray Young". The signature is fluid and cursive, with the first name "Ray" and last name "Young" clearly distinguishable.

Ray G. Young
Senior Vice President and Chief Financial Officer
Archer Daniels Midland Company
April 9, 2014